## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

No. 17-BK-3283-LTS

THE COMMONWEALTH OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

No. 17-BK-4780-LTS

THE PUERTO RICO ELECTRIC POWER AUTHORITY

AUTORIDAD DE ENERGIA ELECTRICA DE PUERTO RICO,

Plaintiff

No. 19-AP-453-LTS

v.

VITOL S.A.; VITOL INC.,

Defendants.

# <u>VITOL INC. & VITOL S.A.'S INFORMATIVE MOTION REGARDING</u> <u>ATTENDENCE, PARTICIPATION, AND OBSERVATION</u> AT THE MARCH 4–5, 2020, HEARING

PLEASE TAKE NOTICE that, pursuant to this Court's Order Regarding Procedures for Attendance, Participation, and Observation of March 4–5, 2020, Omnibus Hearing, Vitol Inc. ("VIC") and Vitol S.A. ("VSA") respectfully state as follows:

1. Alexander L. Kaplan of Susman Godfrey LLP and Eduardo Zayas-Marxuach of McConnell Valdés LLC will appear on behalf of VIC and Andrés W. López of The Law Offices

of Andrés W. López will appear on behalf of VSA in Courtroom 3 in the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918.

- 2. Mr. Kaplan, Mr. Zayas-Marxuach, and Mr. López request to be heard on behalf of VIC and VSA on the Puerto Rico Electric Power Authority's Motion to Remand in the adversary proceeding styled *Puerto Rico Electric Power Authority v. Vitol S.A.*, ECF 8, Case No. 19-ap-453, as well as Vitol Inc. and Vitol S.A.'s Objection to PREPA's Motion to Remand, ECF 10, Vitol Inc. and Vitol S.A.'s Alternative Motion to Extend Deadline for Removal under Fed. R. Bankr. P. 9027(a)(2), ECF 11, the Puerto Rico Electric Power Authority's (1) Reply to Defendants' Objection to Motion to Remand, and (2) Opposition to Defendants' Alternative Motion for Leave to Extend Deadline for Removal Under Fed. R. Bankr. P. 9027(a)(2), ECF 15, and Vitol Inc. and Vitol S.A.'s Sur-Reply in Opposition to PREPA's Motion to Remand, ECF 18, and all related papers.
- 3. Mr. Kaplan, Mr. Zayas-Marxuach, and Mr. López reserve the right to be heard on any matter raised by any party at the March 4–5, 2020, Omnibus Hearing that concerns VIC and VSA and that relates to the Title III cases, any adversary proceeding pending in the Title III Cases, or any other matter raised at the Omnibus Hearing.

Respectfully Submitted,

In San Juan Puerto Rico, this 28th day of February 2020

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### **CERTIFICATE OF SERVICE**

This certifies that on February 28, 2020, all counsel of record have been served a copy of the foregoing document through the Court's CM/ECF service.

This further certifies that on February 28, 2020, the United States Trustee for Region 21 was served a copy of this document by United States Priority Mail at the address below.

Office of the United States Trustee for Region 21 Edificio Ochoa, 500 Tanca Street, Suite 301 San Juan, PR 00901-1922

s/ Michael C. Kelso
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